

December 6th 2018

NBFIRA 3/3/5-II (27)

To: AML/CFT Compliance Officers / Principal Officers - Non-Bank Financial Institutions ("NBFIs")

Dear Sir/Madam,

1. We refer to the captioned subject matter.
2. Botswana has an obligation to support international efforts to prevent, suppress and disrupt money laundering, proliferation of weapons of mass destruction and the financing of terrorism.
3. In furtherance of the above, regulated entities (**referred to as specified parties under the Financial Intelligence Amendment Act 2018**) are required to search their databases for any existence, assets, dealings or relationship with the listed entities from the United Nations Security Council ("UNSC") sanctions lists and report any **positive matches, near matches or no matches** to the **Financial Intelligence Agency (FIA) without delay**.
4. Kindly note that all regulated entities are therefore required to immediately search their databases upon receipt of this circular. **To make these reporting arrangements, entities are kindly advised to contact FIA at: 3998402.**
5. Below is an extract **list of individuals/entities subject to UNSC Sanctions as of November 19th, 2018**. The list comprises of a section on;
- Section A on Individuals

A. **Individuals**

QDi.420 Name: 1: HAJJI 2: 'ABD AL-NASIR 3: na 4: na
Title: na **Designation:** na **DOB:** Between 1965 and 1969 **POB:** Tall 'Afar, Iraq **Good quality a.k.a.:** a) Hajji Abdelnasser b) Hajji Abd al-Nasr **Low quality a.k.a.:** Taha al-Khuwayt **Nationality:** Iraq **Passport no:** na **National identification no:** na **Address:** Syrian Arab Republic **Listed on:** 19 Nov. 2018 **Other information:** ISIL military leader in the Syrian Arab Republic as well as chair of the ISIL Delegated Committee, which exercises administrative control of ISIL's affairs. INTERPOL-UN Security Council Special Notice web link: www.interpol.int/en/notice/search/un/xxx.



6. NBFIs are reminded of UNSC renewal of the sanctions regime concerning South Sudan including arms embargo on the entire territory on May 31st 2018. In connection with these sanctions entities are requested to search their client base and do the needful regarding the following persons;

A. Individuals

SSi.008 Name: 1: PAUL 2: MALONG 3: AWAN 4: na

Title: General **Designation:** a) Former Chief of Staff of the Sudan People's Liberation Army (SPLA) b) Former Governor, Northern Bahr el-Ghazal State **DOB:** a) 1962 b) 4 Dec. 1960 c) 12 Apr. 1960 **POB:** Malualkon, South Sudan **Good quality a.k.a.:** a) Paul Malong Anei b) Paul Malong c) Bol Malong **Low quality a.k.a.:** na **Nationality:** a) South Sudan b) Uganda **Passport no:** a) South Sudan number S00004370 b) South Sudan number D00001369 c) Sudan number 003606 d) Sudan number 00606 e) Sudan number B002606 **National identification no:** na **Address:** na **Listed on:** 13 Jul. 2018 **Other information:** As Chief of General Staff of the SPLA, Malong expanded or extended the conflict in South Sudan through breaches of the Cessation of Hostilities Agreement and breaches of the 2015 Agreement on the Resolution of the Conflict in South Sudan (ARCSS). He reportedly directed efforts to kill opposition leader Riek Machar. He ordered SPLA units to prevent the transport of humanitarian supplies. Under Malong's leadership, the SPLA attacked civilians, schools and hospitals; forced the displacement of civilians; carried out enforced disappearances; arbitrarily detained civilians; and conducted acts of torture, and rape. He mobilized the Mathiang Anyoor Dinka tribal militia, which uses child soldiers. Under his leadership, the SPLA restricted UNMISS, the Joint Monitoring and Evaluation Commission (JMEC), and CTSAMM access to sites to investigate and document abuses.

SSi.003 Name: 1: JAMES 2: KOANG 3: CHUOL 4: na

Title: Major General **Designation:** na **DOB:** 1961 **POB:** na **Good quality a.k.a.:** a) James Koang Chol Ranley b) James Koang Chol c) Koang Chuol Ranley d) James Koang Chual **Low quality a.k.a.:** na **Nationality:** South Sudan **Passport no:** R00012098, South Sudan **National identification no:** na **Address:** na **Listed on:** 1 Jul. 2015 **Other information:** Appointed commander of the Sudan People's Liberation Army in Opposition (SPLA-IO) Special Division in December 2014. His forces have been engaged in attacks against civilians. In February 2014, forces under his command attacked United Nations camps, hospitals, churches, and schools, engaging in widespread rape, torture, and the destruction of property, in an attempt to flush out civilians, soldiers, and policemen allied with the government. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/5879069>.

SSi.002 Name: 1: SIMON 2: GATWECH 3: DUAL 4: na

Title: Major General **Designation:** Chief of General Staff, SPLA in Opposition **DOB:** 1953 **POB:** a) Akobo, Jonglei State, Sudan/South Sudan b) Uror County, Jonglei State, Sudan/or South Sudan **Good quality a.k.a.:** a) Simon Gatwich Dual b) Simon Getwech Dual c) Simon Gatwec Dual d) Simon Gatweach e) Simon Gatwick f) Simon Gatwech g) Simon Garwich **Low quality a.k.a.:** a) General Gaduel b) Dhual **Nationality:** na **Passport no:** na **National identification no:** na **Address:** Jonglei State, Sudan/South Sudan **Listed on:** 1 Jul. 2015 (amended on 3 Nov. 2016) **Other :** Is the SPLM-IO Chief of General Staff and was previously the commander of opposition forces in Jonglei State. His forces conducted an early February 2015 attack in Jonglei State, and as of March 2015, he had tried to destroy the peace in Jonglei State through attacks on the civilian population. Photograph available for inclusion in the INTERPOL-UN Security Council Special Notice. INTERPOL-UN Security Council Special Notice web link: <https://www.interpol.int/en/notice/search/un/5879066>.

SSi.006 Name: 1: PETER 2: GADET 3: na 4: na

Title: a) General b) Major General **Designation:** na **DOB:** Between 1957 and 1959 **POB:** a) Mayom County Unity State b) Mayan, Unity State **Good quality a.k.a.:** a) Peter Gatdet Yaka b) Peter Gadet Yak c) Peter Gadet .Yaak d) Peter Gatdet Yaak e) Peter Gatdet f) Peter Gatdeet Yaka **Low quality a.k.a.:** na **Nationality:** na **Passport no:** na **National identification no:** na **Address:**



na **Listed on:** 1 Jul. 2015 **Other information:** Appointed the SPLA-IO's Deputy Chief of Staff for Operations on December 21, 2014. Forces under his command targeted civilians, including women, in April 2014 during an assault on Bentiu, including targeted killings on the basis of ethnicity. INTERPOL-UN Security Council Special Notice web link:
<https://www.interpol.int/en/notice/search/un/5879076>.

SSi.001 Name: 1: GABRIEL 2: JOK RIAK 3: MAKOL 4: na
Title: Lieutenant General **Designation:** a) Former Sudan People's Liberation Army's (SPLA) Sector One Commander b) Chief of Defence Forces **DOB:** 1 Jan. 1966 **POB:** Bor, Sudan/South Sudan **Good quality a.k.a.:** a) Gabriel Jok b) Jok Riak c) Jock Riak **Low quality a.k.a.:** na **Nationality:** South Sudan **Passport no:** South Sudan D00008623 **National identification no:** M6600000258472 **Address:** a) Unity State, South Sudan b) Wau, Western Bahr El Ghazal, South Sudan **Listed on:** 1 Jul. 2015 (amended on 21 Nov. 2018) **Other information:** Appointed as Chief of Defence Forces on 2 May 2018. Commanded SPLA Sector One, which operates primarily within Unity State, since January 2013. In his position as the SPLA Sector One commander, he has expanded or extended the conflict in South Sudan through breaches of the Cessation of Hostilities Agreement. The SPLA is a South Sudanese military entity that has engaged in actions that have extended the conflict in South Sudan, including breaches of the January 2014 Cessation of Hostilities Agreement and the May 9, 2014 Agreement to Resolve the Crisis in South Sudan, which was a re-commitment to the CoHA and has obstructed the activities of IGAD's Monitoring and Verification Mechanism. INTERPOL-UN Security Council Special Notice web link:
<https://www.interpol.int/en/notice/search/un/5879060>.

SSi.005 Name: 1: MARIAL 2: CHANUONG 3: YOL 4: MANGOK
Title: na **Designation:** a) Sudan People's Liberation Army Major General b) Commander, Presidential Guard Unit **DOB:** 1 Jan. 1960 **POB:** Yirol, Lakes State **Good quality a.k.a.:** a) Marial Chinuong b) Marial Chan c) Marial Chanoung Yol d) Marial Chinoum **Low quality a.k.a.:** na **Nationality:** South Sudan **Passport no:** R00005943, South Sudan **National identification no:** na **Address:** na **Listed on:** 1 Jul. 2015 **Other information:** His Presidential Guard led the slaughter of Nuer civilians in and around Juba, many who were buried in mass graves. One such grave was purported to contain 200-300 civilians. INTERPOL-UN Security Council Special Notice web link:
<https://www.interpol.int/en/notice/search/un/72684667>.

SSi.007 Name: 1: MALEK 2: REUBEN 3: RIAK 4: RENGU
Title: Lieutenant General **Designation:** a) Deputy Chief of General Staff for Logistics b) Deputy Chief of Defence Staff and Inspector General of the Army **DOB:** 1 Jan. 1960 **POB:** Yei, South Sudan **Good quality a.k.a.:** Malek Ruben **Low quality a.k.a.:** na **Nationality:** South Sudan **Passport no:** na **National identification no:** na **Address:** na **Listed on:** 13 Jul. 2018 **Other information:** As SPLA Deputy Chief of Staff for Logistics, Riak was one of the senior officials of the Government of South Sudan who planned and oversaw an offensive in Unity state in 2015 that resulted in widespread destruction and large population displacement.

SSi.004 Name: 1: SANTINO 2: DENG 3: WOL 4: na
Title: Major General **Designation:** Commander of the SPLA's Third Division **DOB:** 9 Nov. 1962 **POB:** Aweil, Sudan/South Sudan **Good quality a.k.a.:** a) Santino Deng Wuol b) Santino Deng Kuol **Low quality a.k.a.:** na **Nationality:** na **Passport no:** na **National identification no:** na **Address:** na **Listed on:** 1 Jul. 2015 **Other information:** Has led and directed military actions against opposition forces and conducted confrontational troop movements in violation of the CoHA. During May 2015, forces under his command killed children, women and old men, burned property, and stole livestock as they advanced through Unity State towards Thorjath oil field. INTERPOL-UN Security Council Special Notice web link:
<https://www.interpol.int/en/notice/search/un/5879071>.



7. Kindly note that this list and any that have been disseminated before this one are in full force and effect until the UNSC advises otherwise. Regulated entities are therefore expected to monitor and be on high alert for any future dealings or relationships with the listed entities and/or individuals of all circulars that have been disseminated to date and are responsible to continuously and timeously familiarize themselves with updates made by the UNSC and the Financial Action Task Force (“FATF”) in their respective websites.
8. In addition, kindly view the FATF website at <http://www.fatf-gafi.org/countries/#high-risk> for updates on high risk and non-co-operative jurisdictions. Regulated entities are required to apply enhanced due diligence to business relationships and transactions with individuals from high risk and non-co-operative jurisdictions.
9. Regulated entities that provide products or services to the listed individuals, entities and other groups as a result of failing to implement adequate screening measures **not only commit an offence in accordance with section 9 of the Financial Intelligence (Amendment) Act but also expose themselves to an extremely high risk of terrorist financing and/or advancing weapons proliferation objectives.**
10. Please find attached an acknowledgement form which must further be filled in by all regulated entities and returned back to NBFIRA on/before December 14th, 2018 through amlcft@nbfira.org.bw. For any clarity on the above, kindly contact us at 310 2595 or 368 6100.

Yours faithfully



Leonard Moeng

Principal Officer - AML/CFT Department

